

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

Criminal No. 05-10102-JLT

JOHN BRUENS, MARY STEWART, MARC
SIROCKMAN, and MELISSA VAUGHN,

Defendants.

UNITED STATES' MOTION FOR LEAVE TO FILE ITS CONSOLIDATED
OPPOSITION TO THE DEFENDANTS STEWART AND SIROCKMAN'S MOTIONS
FOR SEPARATE TRIALS; AND DEFENDANTS BRUENS AND VAUGHN'S MOTION
TO PRECLUDE ADMISSION OF MARY STEWART'S STATEMENT IN
EXCESS OF TWENTY PAGES, PURSUANT TO L. R. 7.1(4)
(ASSENTED TO)

Now comes the United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and files this Motion for Leave to file its Consolidated Opposition to the Motions of Defendants Stewart and Sirockman for Separate Trials, and, the Motions of Defendants Bruens and Vaughn's to Preclude Admission of Statement Made By co-defendant Mary Stewart in excess of twenty pages, pursuant to L. R. 7.1(4), for the reasons that:

1. The United States has responded to three of the defendants' motions with this Consolidated Opposition because each of these motions are interrelated and the resolution of one may dictate the result on each of the remainder of the motions.

2. The brief is twenty-eight pages in length, which is

just over the twenty page limitation.

3. In order to sufficiently treat the complexity of the fact and legal issues presented in these three motions, the length of this Memorandum is not excessive.

4. Pursuant to L. R. 7.1, counsel have conferred and counsel for each of the defendants have assented to this motion.

Wherefore, the United States requests leave to file its, Consolidated Opposition to the Motions of Defendants Stewart and Sirockman for Separate Trials, and, the Motions of Defendants Bruens and Vaughn's to Preclude Admission of Statement Made By Co-defendant Mary Stewart in excess of twenty pages.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Mary Elizabeth Carmody
MARY ELIZABETH CARMODY
SUSAN M. POSWISTILO
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: October 17, 2006

/S/Mary Elizabeth Carmody
MARY ELIZABETH CARMODY
Assistant United States Attorney